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FOODMATCH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICHAEL DODGE,

Plaintiff,

v.

FOODMATCH, INC., and DOES ONE
through TWENTY, inclusive,

Defendants.

Case No. CV 12-03650 JSW

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE THE
DEADLINES FOR DISCOVERY
CUTOFF AND DISCLOSURE OF FINAL
ROUND OF EXPERTS**

Plaintiff MICHAEL DODGE ("Plaintiff") and Defendant FOODMATCH, INC.
("Defendant") by and through their counsel of record herein, hereby stipulate and agree as
follows:

1 WHEREAS, the Court issued a Civil Minute Order on November 16, 2012, ordering the
 2 parties to, among other things, complete discovery by April 29, 2013 and disclose their final
 3 round of experts by May 14, 2013;

4 WHEREAS, the parties participated in a mediation on February 14, 2013 before Robert
 5 Fries, Esq. and delayed commencement of discovery pending the results of the mediation;

6 WHEREAS, the parties were unsuccessful in resolving the case at mediation;

7 WHEREAS, the parties have been diligently attempting to comply with the Court's
 8 pretrial order but need additional time to complete discovery, including depositions;

9 WHEREAS, the parties need additional time to retain and prepare experts prior to
 10 disclosure;

11 WHEREAS, the parties wish to have an opportunity to discuss settlement before retaining
 12 and obtaining reports from all experts;

13 WHEREAS, the parties agree that continuing the current pre-trial deadlines will not
 14 prejudice any party in this case;

15 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to extend
 16 the following pre-trial deadlines set by the Court on November 16, 2012, by approximately three
 17 months as follows:

- 18 1. Close of Fact Discovery from April 29, 2013 to August 1, 2013
- 19 2. Last Day to Disclose Experts from May 14, 2013 to August 15, 2013
- 20 3. Close of Expert Discovery from May 29, 2013 to August 29, 2013
- 21 4. Hearing Dispositive Motions from August 16, 2013 at 9:00 a.m. to October 11, 2013
 22 at 9:00 a.m.
- 23 5. Pre-trial Conference from November 12, 2013 at 2:00 p.m. to December 16, 2013 at
 24 2:00 p.m.

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The Court CONTINUES to January 8, 2014
The parties do not propose any changes to the dates set for Jury Selection (December 4,
2013 at 8:00 a.m.) or Jury Trial (December 9, 2013 at 8:00 a.m.).

Dated: April 2, 2013

LAW OFFICES OF STEPHEN M. MURPHY

By: /s/ P. Bobby Shukla
STEPHEN M. MURPHY
P. BOBBY SHUKLA
Attorneys for Plaintiff
MICHAEL DODGE


Dated: April 2, 2013

FARBSTEIN & BLACKMAN

By: /s/ Michael A. Farbstein
MICHAEL A. FARBSTEIN
Attorneys for Defendant
FOODMATCH, INC.

IT IS SO ORDERED, AS MODIFIED ABOVE.

Dated: April 8, 2013

By: 
JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE